

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

FARESHA SIMS,

Plaintiff,

v.

**UNIVERSITY OF MARYLAND MEDICAL
SYSTEM CORPORATION, et al.,**

Defendants.

Case No. 1:19-cv-00295-CCB

DEFENDANTS' INDEX OF EXHIBITS
OFFERED IN SUPPORT OF THEIR MOTION FOR SUMMARY JUDGMENT

Pursuant to Local Rule 105(5), Defendants University of Maryland Medical System Corporation (the Medical System), University of Maryland Medical Center, LLC (the Medical Center), Lisa Rowen, and Linda Goetz hereby submit the following Index of Exhibits offered in support of their Motion for Summary Judgment.

Exhibit	Description
1	Declaration of Vishal H. Shah
2	Excerpts from the transcript of the deposition of Plaintiff Faresha Sims
3	Excerpts from the transcript of the deposition of Defendant Linda Goetz
4	Excerpts from the transcript of the deposition of Defendant Lisa Rowen
5	Excerpts from the transcript of the deposition of Dr. Melissa Frisch
6	Excerpts from the transcript of the deposition of Susan Hussey (Rule 30(b)(6) witness)
7	Report by Edward J. Bierhanzl
8	Plaintiff's Responses and Objections to Defendants' First Set of Interrogatories Directed to Plaintiff
9	Plaintiff's Supplemental Responses to Defendants' First Set of Interrogatories Directed to Plaintiff
10	Plaintiff's Responses and Objections to Defendants' First Set of Requests for Admission to Plaintiff

11	Defendant University of Maryland Medical System Corporation's Supplemental Responses to Plaintiff's Interrogatories
12	Defendant University of Maryland Medical Center, LLC's Supplemental Responses to Plaintiff's Interrogatories
13	Defendant Linda Goetz's Objections and Responses to Plaintiff's Interrogatories
14	Declaration of Linda J. Goetz
15	CRNA Job Description
16	<i>Substance Use Disorder (SUD) in the Workplace</i> , AANA News Bulletin, May 2015.
17	<i>Opioid Abuse Among Nurse Anesthetists and Anesthesiologists</i> , AANA Journal, Vol. 80, No. 2, April 2012
18	<i>Addiction and Substance Abuse in Anesthesiology</i> , The American Society of Anesthesiologists, Vol. 109, No. 5, November 2008
19	Fitness for Duty Policy
20	Fitness for Duty Evaluation Process
21	Employee Assistance Program
22	Interview Schedule
23	Offer Letter dated July 19, 2012
24	Preliminary Score Report and Letter from NBCRNA dated March 8, 2013
25	Letter from NBCRNA dated March 25, 2013
26	Sims's Transcript from VCU
27	Offer Letters dated January 28, 2013 and April 3, 2013
28	Notes for Sims's Rising Star Award
29	Announcement for Sims's Rising Star Award in May 2014
30	Announcement for Sims's Employee of the Month Award in August 2014
31	Selection Memorandum for Sims's Employee of the Month Award in August 2014
32	Coaching Notes by Linda Goetz re: Sims
33	May 7, 2015 Verbal Warning for Sims
34	Sims Fitness for Duty Referral Form
35	Text Messages between L. Goetz and F. Sims
36	Consent and Disclosure Form signed by F. Sims
37	Emails Chain re: "Work Suspension Resolution"
38	Email Chain re: "Faresha [S]ims"
39	Email Chain re: "Fit for Duty Evaluation" (King)
40	Email Chain re: "Fitness for Duty"
41	Email Chain re: "Fit for Duty Evaluation" (Rowen)
42	Email Chain re: "Work Suspension Resolution"
43	Fitness for Duty Evaluation - Duty Status Form
44	"Excused from Work" Doctor's Note from Patient First
45	Email Chain re: "Meeting Request"

46	Email Chain re: "Meeting Request" (July 8 Confirmation)
47	Email Chain re: "Policy Violation and Discrimination"
48	Meeting Notes
49	Email Chain re: "Policy Violation and Discrimination" (to W. Brown)
50	July 14, 2015 Letter from P. Henderson to F. Sims
51	Memo re: Summary of Complaint, Faresha Sims by W. Brown
52	Email Chain re: "Followup from Our Meeting"
53	August 19, 2015 Letter re: Separation from Employment from P. Henderson to F. Sims
54	Email Chain between K. Widmayer and J. Singleton
55	Written Appeal
56	Step One Appeal Disposition
57	Letter re: Appeal Procedure
58	Appeal Procedure
59	Email Chain re: "Appeal Next Step"
60	Step Two Appeal Disposition
61	September 11, 2015 Letter from N. King to F. Sims
62	Memo re: Sims Investigation by W. Brown
63	F. Sims Charge of Discrimination (December 9, 2015)
64	Sims's Compensation - Medical Center Pay Stubs and W-2 Forms
65	Sims's Compensation - Johns Hopkins Pay Stubs, Shift Information, and Pay/Schedule Information
66	Sims's Compensation - Medical Center Excel File containing Pay Data
67	Declaration of Lisa Rowen
68	Declaration of Edward J. Bierhanzl

Dated: May 3, 2021

Respectfully submitted,

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